

IN THE UNITED STATES DISTRICT COURT FOR THE

EASTERN DISTRICT OF VIRGINIA

Richmond Division

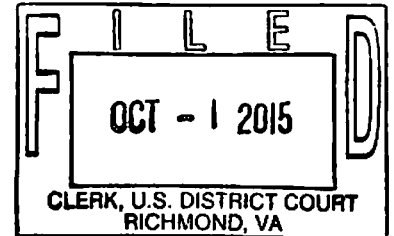
UNITED STATES OF AMERICA

v.

D'QUAN THOMAS,

Defendant.

Criminal No. 3:15cr80



STATEMENT OF FACTS

The United States and the defendant agree that the factual allegations contained in this Statement of Facts and in Count Three of the Indictment are true and correct, and that the United States could have proven them beyond a reasonable doubt.

1. On or about November 11, 2014, in the Eastern District of Virginia, defendant, D'QUAN THOMAS, did knowingly aid and abet the possession and brandishing of a firearm in furtherance of the commission of a crime of violence for which the defendant may be prosecuted in a court of the United States, to wit: Carjacking, in violation of Title 18, United States Code, 2119, all in violation of Title 18, United States Code, Sections 924(c) and 2.

2. On or about November 11, 2014, THOMAS knowingly became part of a plan instigated by Derrell Walker and Mickel Marzouk, to take a motor vehicle by force and threats of violence. In accordance with this plan, Derrell Walker recruited THOMAS to assist in the carjacking, and on November 11, 2014, Walker, Karon Grant, and THOMAS (hereafter collectively referred to as "the assailants") traveled together in Walker's vehicle to two locations searching for a potential victim. Walker was alerted to the victim's vehicle by Mickel Marzouk,

who was not physically present with the assailants but directing them by telephone to potential locations to steal an automobile by force.

3. As part of the plan, Grant followed the victim's vehicle and when given the opportunity, purposefully bumped the back of the victim's vehicle with Walker's car while traveling in the City of Richmond, Virginia. When the victim emerged from his vehicle, one of the assailants brandished a handgun and threatened the victim, compelling him to relinquish control of his vehicle. The victim's vehicle, a Ford Econoline van, was manufactured outside of the state of Virginia and traveled in interstate commerce prior to the carjacking. Grant took the victim's vehicle, and THOMAS drove Walker's vehicle away from the scene. The vehicle and its contents were then turned over the Marzouk, who paid all three participants for their action. THOMAS aided and abetted this crime, and had advance knowledge that Grant was bringing a firearm to use in the carjacking.


I have consulted with my attorney regarding this Statement of Facts and committed the acts described herein knowingly, intentionally, willfully and without legal justification or excuse, with the specific intent to do that which the law forbids, and not by mistake, accident, or any other reason. I knowingly and voluntarily agree that each of the above-recited facts is true and correct and that had this matter gone to trial the United States could have proven each one beyond a reasonable doubt.

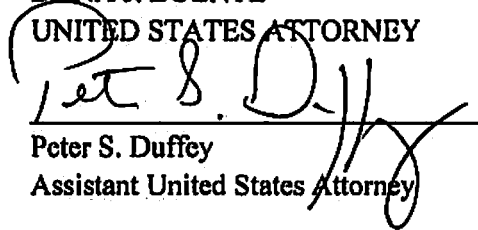
9-30-15
Date

J. Thomas
Defendant

I am counsel for defendant, D'QUAN THOMAS. I have carefully reviewed this Statement of Facts with him and, to my knowledge, his decision to agree to this Statement of Facts is an informed and voluntary decision.

9/30/15
Date


Counsel for Defendant

DANA J. BOENTE
UNITED STATES ATTORNEY
By: 
Peter S. Duffey
Assistant United States Attorney